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January 27, 2025

VIA ELECTRONIC COURT FILING

The Hon. Paul A. Engelmayer
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 1305
New York, NY 10007

**Re: *Anatolie Stati, et al. v. Republic of Kazakhstan*, Case No. 1:19-MC-00382-PAE
Agreed Motion to Vacate Opinion and Order [ECF No. 39] Based On
Settlement and Related Withdrawal of Subpoena to Citi**

Dear Judge Engelmayer:

Petitioners Anatolie Stati, Gabriel Stati, Ascom Group, S.A., and Terra Raf Trans Traiding Ltd. ("Petitioners" or "Judgment Creditors"), together with Respondent Republic of Kazakhstan ("Respondent" or "Judgment Debtor"), and third-parties Citibank N.A., Citicorp LLC, Citigroup Inc., Citigroup Global Markets Inc., and Citigroup Investments, Inc. (together, "Citi"), hereby file this letter motion pursuant to Fed. R. Civ. P. 60, Local Civil Rules 6.1 and 7.1(e), and Section 1(A) of Your Honor's Individual Rules and Practices in Civil Cases, and respectfully state as follows:

On July 17, 2024, Your Honor entered an Opinion and Order [ECF No. 39] (the "Order"), which, among other things, granted *in part* and denied *in part* Petitioners' motion to compel [ECF No. 27] (the "Motion to Compel") Citi to provide certain information in response to Petitioners' post-judgment subpoenas (the "Subpoenas") within 30 days of the Order, or by August 16, 2024 (the "Response Deadline"). ECF No. 39 at 12-13. The Response Deadline was extended to and through January 31, 2025 in response to prior Agreed Letter Motions seeking to preserve the *status quo* pending efforts to conclude the settlement anticipated under the framework agreement for the resolution to the long running dispute that *inter alia* gave rise to the judgment. *See* ECF Nos. 41, 44 and 46.

Petitioners and Respondent confirm that the settlement has been finalized and the parties intend to file a stipulation of dismissal shortly. Petitioners further confirm that the Subpoenas to (i) Citi and (ii) all other subpoenas issued to any other persons in the above-captioned action are withdrawn. Citi is relieved of any obligation to comply with the previously issued subpoenas.

January 27, 2025

Based on the foregoing, the parties respectfully request that Your Honor's prior Order compelling Citi to provide certain information in response to Petitioners' Subpoenas be vacated.

Respectfully submitted,

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GRANTED. In light of petitioners' representation that they have withdrawn all subpoenas they have issued in this matter, including to the Citibank entities, the Court vacates its order at docket 39. The Clerk of Court is respectfully directed to terminate all pending motions and close this case.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

Dated: January 28, 2025
New York, New York